

# Complaint Against — Kansas City Chiefs

OFFICE OF THE  
COMMISSIONER OF  
ELECTIONS  
OFFICE OF GENERAL  
COUNSEL

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**RESPONDENT:** Kansas City Chiefs

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**COMPLAINT:**

This incident occurred at Arrowhead Stadium in Kansas City, Missouri on Sunday, November 2<sup>nd</sup>, 2008, prior to the start of the National Football League game between the Kansas City Chiefs and the Tampa Bay Buccaneers football teams. There were approximately 75-80,000 fans in attendance at this game.

This incident occurred only two days before the presidential elections on Tuesday, November 4<sup>th</sup>, 2008.

The pre-game show was stated to be a tribute to American veterans, and included a presentation on the two huge Jumbotron screens at either end of the stadium. The on-screen presentation was a "speech" honoring American veterans, given by Senator John McCain — candidate for president.


I feel that, given the proximity to such a hotly-contested presidential election, this essentially free publicity could have amounted to an unrecorded in-kind contribution that the Kansas City Chiefs organization provided the McCain presidential election campaign efforts.

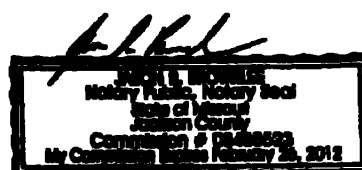
Also, given the fact that the election results in Missouri were so narrow (McCain defeated Barack Obama by less than 4,000 votes with almost 3 million votes cast in Missouri), and took approximately two weeks to ultimately determine, this incident could have materially influenced the outcome of the presidential race in Missouri.

Had this presidential election been as close as the one in 2000 when Florida was the critical state; or in 2004 when Ohio was the critical state — then, Missouri could have ended-up being in a critical position to ultimately decide the outcome of the historic 2008 presidential election.

Under the circumstances of such a hotly-contested presidential campaign, as well as the proximity to the November 4<sup>th</sup> election, NEITHER candidate should have been afforded an opportunity by the Kansas City Chiefs organization to make a "free" presentation before nearly 75-80,000 prospective voters. And finally, the Kansas City Chiefs organization should not have potentially influenced the outcome of this historic election in Missouri.

This complaint is signed and sworn by the Complainant before me under penalty of perjury.

  
DAVID A. RAFFEL



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